THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

SYMBOLOGY INNOVATIONS, LLC,

Plaintiff,

v.

ALEXANDER MCQUEEN TRADING AMERICA, INC., BOTTEGA VENETA, INC., and YVES SAINT LAURENT AMERICA, INC.

Defendants.

CIVIL ACTION NO. 3:23-cv-1755-L-BN

CONSOLIDATED WITH CIVIL ACTION Nos.: 3:23-cv-1902-L and 3:23-cv-1881-L

JURY TRIAL DEMANDED

JOINT MOTION TO MODIFY BRIEFING SCHEDULE

On February 6, 2024, defendants Alexander McQueen Trading America, Inc., Bottega Veneta, Inc., and Yves Saint Laurent America, Inc. (collectively "Defendants") filed a Motion to Dismiss for Failure to State a Claim ("MTD") (Dkt. 29). On the same day, the Court issued an Order (Dkt. 30) setting the following briefing schedule for Defendants' MTD:

- Plaintiff's deadline to file a written response to the MTD: March 7, 2024.
- Defendants' deadline to file a reply brief: March 22, 2024.

The Parties are currently engaged in substantive settlement discussions. Accordingly, the Parties jointly move the Court to extend Plaintiff's deadline to file a written response by one (1) week, up to and including <u>March 14, 2024</u>, and Defendants' deadline to file a reply brief by one (1) week, up to and including <u>March 29, 2024</u>.

The requested extensions are for the purpose of giving the Parties additional time to explore settlement prior to expending additional time and resources briefing the MTD.

Dated: February 26, 2024 Respectfully Submitted,

/s/ Christopher A. Honea

Christopher A. Honea
Texas Bar No. 24059967
chonea@ghiplaw.com
M. Scott Fuller
Texas Bar No. 24036607
rgarteiser@ghiplaw.com

GARTEISER HONEA, PLLC

119 W. Ferguson Street Tyler, Texas 75702 Telephone: (903) 705-7420 Facsimile: (903) 405-3999

COUNSEL FOR PLAINTIFF

/s/ Jared D. Eisenberg

Christopher Schwegmann (SBN 24051315) Jared D. Eisenberg (SBN 24092382)

LYNN PINKER HURST & SCHWEGMANN, LLP

2100 Ross Avenue, Suite 2700

Dallas, Texas 752101 Telephone: (214) 981-3800 Facsimile: (214) 981-3839

Email: cschwegmann@lynnllp.com
Email: jeisenberg@lynnllp.com

Joshua B. Long (SBN 24078876)

KELLEY DRYE & WARREN LLP

515 Post Oak Boulevard, Suite 900

Houston, Texas 77027 Telephone: (713) 355-5000 Facsimile: (713) 355-5001 Emails: jlong@kelleydrye.com

Michael J. Zinna (Admitted *Pro Hac Vice*) Vincent M. Ferraro (Admitted *Pro Hac Vice*)

KELLEY DRYE & WARREN LLP

3 World Trade Center New York, New York 10007 Telephone: (212) 808-7800 Facsimile: (212) 808-7897 Email: mzinna@kelleydrye.com Email: <u>vferraro@kelleydrye.com</u>

Attorneys for Defendants Yves Saint Laurent America, Inc., Alexander McQueen Trading America, Inc., and Bottega Veneta, Inc.